



Plaintiff by ordering him to pay Defendant's reasonable attorneys' fees incurred in drafting and filing the *Motion to Compel*. *Id.*

On March 9, 2016, the Court entered an *Order Granting Defendant's Motion to Compel Discovery Responses*. See Docket No. 55.

On April 6, 2016, the Court entered an *Order on Fed. R. Civ. P. 37 Award of Expenses*, awarding Defendant its attorneys' fees and expenses incurred in connection with filing its *Motion to Compel* and ordering the parties to meet and confer in-person on the amount of attorneys' fees and costs to be awarded to Defendant and file a joint status report regarding same. See Docket No. 60.

On April 18, 2016, the parties met in-person at defense counsel's office to confer regarding the amount of attorneys' fees and costs to be awarded to Defendant. During the conference, the parties agreed that Defendant is entitled to \$1,510.50 in attorneys' fees and costs in connection with preparing and filing its *Motion to Compel*. The parties also agreed that Plaintiff will pay Defendant the \$1,510.50 in full by June 1, 2016 and any and all payment checks for this amount must be made payable to "Ogletree, Deakins, Nash, Smoak & Stewart, P.C." and mailed or hand-delivered to defense counsel.

## II.

### CONCLUSION AND REQUESTED RELIEF

For all the foregoing reasons, the parties respectfully request the Court enter the attached proposed *Agreed Order Awarding Attorneys' Fees and Expenses to Defendant*, that awards Defendant \$1,510.50 in attorneys' fees and costs incurred in connection with the preparation and filing of *Defendant's Motion to Compel* (Docket No. 52) and requires Plaintiff to pay this amount in full by June 1, 2016, to Defendant.

Respectfully submitted,

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